

Proposed Form of Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard
L. Madoff Investment Securities LLC,

Plaintiff,

v.

Edward A. Zraick, Jr., individually and as joint tenant;
Nancy Zraick, individually and as joint tenant; Patricia
Zraick DeLuca, individually and as joint tenant; Karen M.
Rich, individually and as joint tenant; Estate of Lorraine
Zraick; Edward A. Zraick, Jr., as personal representative of
the Estate of Lorraine Zraick; and Patricia Zraick DeLuca, as
personal representative of the Estate of Lorraine Zraick,

Defendants.

Adv. Pro. No. 10-05257 (SMB)

**ORDER (I) EXTENDING TIME FOR DEFENDANTS'
REBUTTAL EXPERT DISCLOSURES AND (II) COMPELLING
THE PRODUCTION OF DOCUMENTS CONCERNING SECURITIES
LISTED ON DEFENDANTS' CUSTOMER STATEMENTS**

Upon consideration of the motion (the "Motion")¹ of defendants Edward A. Zraick, Jr., Nancy Zraick, Patricia DeLuca and Karen Rich (collectively, the "Defendants") for the entry of an order (i)(a) extending Defendants' February 2, 2017 deadline for rebuttal expert disclosures

¹ Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Motion.

by twelve days, to February 14, 2017, or (b) in the alternative, declaring that the Expert Report of Bill Feingold attached as Exhibit A to the Motion (the “Feingold Report”) has been timely served; and (ii) compelling the Trustee to produce documents concerning the securities listed on Defendants’ customer statements; and the Court finding that adequate notice of the relief requested in the Motion has been provided and no further or other notice is necessary; and that good and sufficient cause exists for the granting of the relief requested in the Motion after having given due deliberation upon the Motion;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.
2. The deadline for Defendants’ expert rebuttal disclosures is hereby extended from February 2, 2017 to February 14, 2017, which renders the Feingold Report timely served.
3. The Trustee shall produce to Defendants all documents concerning U.S. Treasury Bills and other securities listed on Defendants’ account statements and the statements of BLMIS accountholders from which funds ultimately were transferred into Defendants’ accounts, within thirty (30) days of entry of this Order.
4. The Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

Dated: New York, New York
March __, 2017

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE